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TS Communication, Inc. )  
d/b/a Telecom\*USA Long Distance )  
Company of Illinois )  
)  
Petition for Emergency and Expedited )  
Relief to Protect from Disclosure in )  
its Entirety for a Period of Not Less )  
Than Five Years Petitioner's 2000 )  
Annual Report )

Docket No. 01-0218

CHIEF CLERK'S OFFICE

PETITION FOR EMERGENCY  
AND EXPEDITED RELIEF

TS Communications, Inc. d/b/a Telecom\*USA Long Distance Company of Illinois ("TS Communications"), by and through one of its attorneys, hereby petitions the Illinois Commerce Commission ("Commission") to grant to it the emergency relief requested herein. In support of this petition, TS Communications states as follows:

1. As a telecommunications carrier subject to the jurisdiction of the Commission, TS Communications is required to file with the Commission an annual report. TS Communications is prepared to file the requisite annual report with the Commission once this petition for proprietary treatment is granted.

2. Due to the content and nature of the filings, TS Communications's annual report will necessarily contain commerce and financial information that is highly sensitive, proprietary, confidential and the type of information which would be of particular interest to TS Communications's competitors and potential competitors.

3. Because the information that will be contained in TS Communications's annual report is so competitively sensitive, it is imperative that public disclosure of the proprietary information

that will be contained in its annual report be maintained under seal for a period not less than five years following the issuance of an Order herein by this Commission, since disclosure of this information any earlier would be likely to cause TS Communications serious competitive harm.

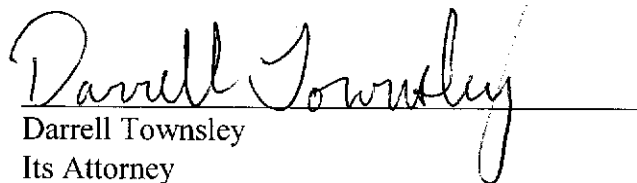
4. Section 7 of the Illinois Freedom of Information Act, 5 ILCS 140/7 (g) (1994) exempts from public disclosure "trade secrets and commercial or financial information . . . where such trade secrets or information are proprietary, privileged or confidential." The annual report that is the subject of this Petition falls within this exemption.

WHEREFORE, TS Communications, Inc. respectfully requests that the Commission issue an expedited Order protecting from disclosure in its entirety for a period of not less than five years TS Communications's 2000 annual report.

Respectfully submitted,

**TS Communications, Inc. d/b/a  
Telecom\*USA Long Distance  
Company of Illinois**

By:



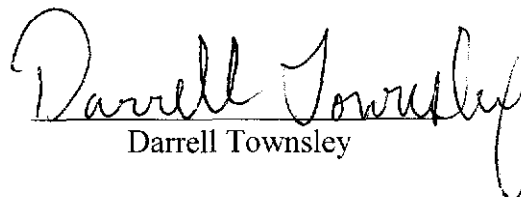
Darrell Townsley  
Its Attorney  
205 North Michigan Avenue  
Suite 3700  
Chicago, Illinois 60601  
(312) 470-3395

Dated: March 5, 2001

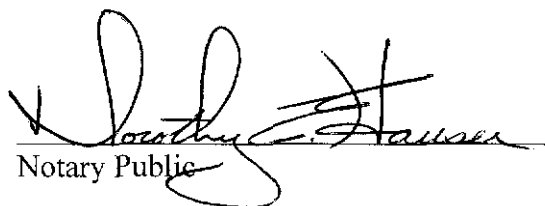
STATE OF ILLINOIS       )  
                                      )  
COUNTY OF COOK       )       SS:

VERIFICATION

Darrell Townsley, being first duly sworn, deposes and states that he is an attorney for TS Communications, Inc. d/b/a Telecom\*USA Long Distance Company of Illinois that he has read the foregoing Petition for Emergency and Expedited Relief seeking proprietary treatment for its 2000 annual report and has knowledge of the contents thereof, and that the information therein contained are true to the best of his knowledge, information and belief.

  
Darrell Townsley

SUBSCRIBED AND SWORN to  
before me this 5th day  
of March, 2001

  
Notary Public

My Commission Expires: 07-28-2001

